

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE CONSUMER ADVOCATE

Postal Rate and Fee Changes, 1997

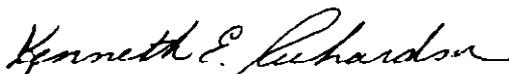
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Docket No. R97-1

ANSWER OF THE OFFICE OF THE CONSUMER ADVOCATE
TO AN INTERROGATORY OF UNITED STATES POSTAL SERVICE
(USPS/OCA-1)
(FEBRUARY 6, 1998)

The Office of the Consumer Advocate hereby submits the answer of the Office of the Consumer Advocate to an interrogatory USPS/OCA-1, dated January 23, 1996. The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,



KENNETH E. RICHARDSON

Attorney

Office of the Consumer Advocate

ANSWER OF OCA TO INTERROGATORY USPS/OCA-1

USPS/OCA-1. Please provide a description of and documentation of all alternative mail processing variability analyses considered by OCA witness Smith and/or any other outside consultants contacted by OCA, but not used in OCA testimony. For any analyses conducted by someone other than witness Smith, please identify the individual(s) involved.

A. Witness Smith is the only OCA consultant to consider the mail processing variability analysis of witness Bradley.

OCA is providing a response to the "Notice of Inquiry No. 4 on Mail Processing Variability".

Witness Smith has examined witness Bradley's models, but has performed no analyses not mentioned in his testimony other than to develop some logarithmic plots of data.

The programs used to generate the plots are as follows:

OCR2, LSM2, MANL2, and MANF2: Programs used to generate logarithmic plots for all locations. Plot 9999 in the programs is meaningless.

OCR20, LSM20, MANL20, MANF20: Output of the above programs.

OCR3, LSM3, MANL3, and MANF3: Programs used to generate logarithmic plots for plot 9999. Any other plots in conjunction with these programs should be ignored.

OCR30, LSM30, MANL30, and MANF30: Output of the above programs.

The programs and output are on the four attached disks. In addition, hard copy printouts are attached.

DECLARATION

I, J. EDWARD SMITH, JR. declare under penalty of perjury that the answer to interrogatory USPS/OCA-1 of the United States Postal Service are true and correct, to the best of my knowledge, information and belief.

Executed February 6, 1998

J. Edward Smith, Jr.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

A handwritten signature in cursive script that reads "Kenneth E. Richardson".

KENNETH E. RICHARDSON
Attorney

Washington, DC 20268-0001
February 6, 1998